

# **EXHIBIT 1**

United States



Of America

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for U.S. Individual Income Tax Return (Form 1040), for the tax period ending December 31, 2008 consisting of 5 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040 TAX PERIOD: DEC 2008**

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
09-30-2010	SUBSTITUTE FOR RETURN 29210-888-00000-0		0.00	10-25-2010
	ADDITIONAL TAX ASSESSED BY EXAMINATION EXAM/COLLECTIONS 90 DAY LETTER UNAGREED, CLOSED TO APPEALS 29247-564-10024-1 20112508		0.00	07-04-2011
06-14-2011	LEGAL SUIT PENDING			
	LATE FILING PENALTY 20131805		231.00	05-20-2013
04-15-2009	WITHHOLDING CREDIT		426.00	
	ADDITIONAL TAX ASSESSED BY EXAMINATION AGREED AUDIT DEFICIENCY PRIOR TO 30 OR 60 DAY LETTER ASED 20160603 29247-520-70033-3 20131805	1,350.00		05-20-2013
04-26-2013	LEGAL/BANKRUPTCY PROCEEDING NO LONGER PENDING			
	INTEREST ASSESSED 20131805		180.24	05-20-2013
05-30-2013	AMENDED RETURN FILED 33277-618-00013-3			

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040 TAX PERIOD: DEC 2008**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
07-08-2013	AMENDED RETURN FILED 33277-641-01797-3			
	ADDITIONAL TAX ASSESSED 83254-452-05016-4 20140905		0.00	03-17-2014
04-15-2016	OVERPAID CREDIT APPLIED 1040 201512		1,688.46	
	FAILURE TO PAY TAX PENALTY 20162005	231.00		06-06-2016
	INTEREST ASSESSED 20162005	122.22		06-06-2016
06-21-2016	AMENDED RETURN FILED 89277-582-65404-6			
04-15-2009	REFUNDABLE CREDIT		300.00	
04-15-2009	WITHHOLDING CREDIT		18.00	
11-21-2016	PRIOR TAX ABATED 89254-700-00014-6	1,350.00-		
11-21-2016	LATE FILING PENALTY ABATED	231.00-		
FORM 4340	(REV. 01-2002)	PAGE	2	

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040 TAX PERIOD: DEC 2008**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
11-21-2016	FAILURE TO PAY TAX PENALTY ABATED		231.00-	
11-21-2016	INTEREST ABATED		302.46-	
04-24-2017	CLAIM DISALLOWED 95254-489-98003-7	05		
04-15-2009	CREDIT TRANSFERRED		(300.00)	
04-15-2009	CREDIT TRANSFERRED		(18.00)	
04-15-2009	CREDIT TRANSFERRED		(426.00)	
04-15-2016	OVERPAID CREDIT REVERSED 1040 201512 [REDACTED] 2218		(1,688.46)	
05-20-2013	Statutory Notice of Balance Due			
06-24-2013	Notice of Balance Due			
03-17-2014	Statutory Notice of Balance Due			
03-31-2014	Notice of Balance Due			

**FORM 4340 (REV. 01-2002)**

**PAGE 3**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2008

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
08-18-2014	Statutory Notice of Intent to Levy			

FORM 4340 (REV. 01-2002)

PAGE 4

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2008

BALANCE 0.00

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing  
Service Wide Delegation of Authority

DELEGATION ORDER: Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 5

**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for U.S. Individual Income Tax Return (Form 1040), for the tax period ending December 31, 2009 consisting of 4 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:

A handwritten signature in blue ink, reading "Dagoberto Gonzalez".

Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)



Form **2866** (Rev. 09-1997)



-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218  
3195**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040      TAX PERIOD: DEC 2009**

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
-----				
	ADJUSTED GROSS INCOME			
	42,994.00			
	TAXABLE INCOME			
	29,994.00			
08-24-2011	SUBSTITUTE FOR RETURN 29210-888-00000-1		0.00	09-12-2011
	ADDITIONAL TAX ASSESSED BY EXAMINATION EXAM/COLLECTIONS 90 DAY LETTER UNAGREED, CLOSED TO APPEALS 29247-600-10024-2 20123005		0.00	08-06-2012
07-19-2012	LEGAL SUIT PENDING			
	LATE FILING PENALTY 20141105		784.13	03-31-2014
04-15-2010	REFUNDABLE CREDIT		400.00	
04-15-2010	WITHHOLDING CREDIT		194.00	
	ADDITIONAL TAX ASSESSED BY EXAMINATION AGREED AUDIT DEFICIENCY PRIOR TO 30 OR 60 DAY LETTER ASED 20170414 29247-470-70035-4 20141105	4,079.00		03-31-2014
03-07-2014	LEGAL/BANKRUPTCY PROCEEDING NO LONGER PENDING			
	INTEREST ASSESSED 20141105		597.04	03-31-2014
	FAILURE TO PAY TAX PENALTY 20141105		836.40	03-31-2014

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218  
3195**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040      TAX PERIOD: DEC 2009**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
<b>04-15-2016</b>	<b>OVERPAID CREDIT APPLIED 1040                      201512</b>		<b>6,100.34</b>	
	<b>FAILURE TO PAY TAX PENALTY 20162005</b>		<b>34.85</b>	<b>06-06-2016</b>
	<b>INTEREST ASSESSED 20162005</b>		<b>362.92</b>	<b>06-06-2016</b>
<b>06-21-2016</b>	<b>AMENDED RETURN FILED 89277-582-65405-6</b>			
<b>12-04-2017</b>	<b>CLAIM DISALLOWED 71254-713-98028-7                      05</b>			
<b>01-08-2018</b>	<b>SUBSEQUENT PAYMENT</b>		<b>2,250.00</b>	
<b>01-08-2018</b>	<b>OVERPAYMENT CREDIT TRANSFERRED 1040                      201012</b>		<b>(2,250.00)</b>	
<b>03-14-2011</b>	<b>Taxpayer Delinquency Notice</b>			
<b>03-31-2014</b>	<b>Statutory Notice of Balance Due</b>			
<b>05-05-2014</b>	<b>Notice of Balance Due</b>			

**FORM 4340 (REV. 01-2002)**

**PAGE      2**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2009

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
06-09-2014	Statutory Notice of Intent to Levy			

FORM 4340 (REV. 01-2002)

PAGE 3

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2009

BALANCE 0.00

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing  
Service Wide Delegation of Authority

DELEGATION ORDER: Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 4

United States



Of America

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2011**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abate-  
ments, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for U.S. Individual Income Tax Return (Form 1040), for the tax period ending December 31, 2010 consisting of 3 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Javier Wilbur*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
 3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
 FORM: 1040 TAX PERIOD: DEC 2010

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
	ADJUSTED GROSS INCOME 42,800.00			
	TAXABLE INCOME 33,450.00			
08-27-2013	SUBSTITUTE FOR RETURN 29210-888-00000-3		0.00	09-16-2013
	LATE FILING PENALTY 20142905		945.68	08-04-2014
04-15-2011	REFUNDABLE CREDIT		400.00	
	ADDITIONAL TAX ASSESSED BY EXAMINATION AUDIT DEFICIENCY PER DEFAULT OF 90 DAY LETTER ASED 20170709 29247-595-00016-4 20142905	4,603.00		08-04-2014
	INTEREST ASSESSED 20142905	562.70		08-04-2014
	FAILURE TO PAY TAX PENALTY 20142905	840.60		08-04-2014
04-15-2016	OVERPAID CREDIT APPLIED 1040 201512		2,448.20	
08-16-2016				
07-12-2017	REQUEST FOR INSTALLMENT AGREEMENT PENDING			
07-12-2017	REQUEST FOR INSTALLMENT AGREEMENT NO LONGER PENDING			

FORM 4340 (REV. 01-2002) PAGE 1

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**  
**3195**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040      TAX PERIOD: DEC 2010**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
01-08-2018	OVERPAID CREDIT APPLIED 1040                      200912		2,250.00	
03-19-2018	CLAIM DISALLOWED 71254-458-98011-8                      05			
03-12-2018	AMENDED RETURN FILED 08277-473-01270-8			
03-19-2012	Taxpayer Delinquency Notice			
08-04-2014	Statutory Notice of Balance Due			
08-25-2014	Statutory Notice of Intent to Levy			

**FORM 4340 (REV. 01-2002)**

**PAGE 2**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2010

BALANCE 1,853.78

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing

DELEGATION ORDER: Service Wide Delegation of Authority  
Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 3



**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for U.S. Individual Income Tax Return (Form 1040), for the tax period ending December 31, 2012 consisting of 3 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**  
**6195**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040 TAX PERIOD: DEC 2012**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
	<b>ADJUSTED GROSS INCOME</b> 54,197.00			
	<b>TAXABLE INCOME</b> 44,447.00			
<b>08-13-2014</b>	<b>SUBSTITUTE FOR RETURN</b> 29210-888-00000-4		<b>0.00</b>	<b>09-01-2014</b>
	<b>ESTIMATED TAX PENALTY</b> 20154105		<b>127.95</b>	<b>11-02-2015</b>
	<b>LATE FILING PENALTY</b> 20154105		<b>1,605.60</b>	<b>11-02-2015</b>
	<b>ADDITIONAL TAX ASSESSED BY EXAMINATION AUDIT DEFICIENCY PER DEFAULT OF 90 DAY LETTER ASED 20181026 29247-682-01070-5 20154105</b>		<b>7,136.00</b>	<b>11-02-2015</b>
<b>11-02-2015</b>	<b>RENUMBERED RETURN</b> 29247-682-01070-5			
	<b>INTEREST ASSESSED</b> 20154105		<b>695.14</b>	<b>11-02-2015</b>
	<b>FAILURE TO PAY TAX PENALTY</b> 20154105		<b>1,106.08</b>	<b>11-02-2015</b>
<b>08-03-2016</b>				
<b>07-12-2017</b>	<b>REQUEST FOR INSTALLMENT AGREEMENT PENDING</b>			
<b>08-28-2017</b>				

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: 2218  
3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2012

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
------	----------------------------	---	----------------------------------	--------------------

07-12-2017	REQUEST FOR INSTALLMENT AGREEMENT NO LONGER PENDING			
------------	---	--	--	--

04-14-2014	Taxpayer Delinquency Notice			
------------	-----------------------------	--	--	--

11-02-2015	Statutory Notice of Balance Due			
------------	---------------------------------	--	--	--

11-23-2015	Statutory Notice of Intent to Levy			
------------	------------------------------------	--	--	--

FORM 4340 (REV. 01-2002)

PAGE 2

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN:

218  
195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2012

BALANCE 10,670.77

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER:

Janice Williams

PRINT NAME:

Accounting Operations Manager

TITLE:

Submission Processing

Service Wide Delegation of Authority

DELEGATION ORDER:

Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 3

United States



Of America

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for U.S. Individual Income Tax Return (Form 1040), for the tax period ending December 31, 2013 consisting of 3 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218  
3195**

**TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN**  
**FORM: 1040      TAX PERIOD: DEC    2013**

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
-----				
	ADJUSTED GROSS INCOME			
	54,084.00			
	TAXABLE INCOME			
	44,084.00			
05-01-2015	SUBSTITUTE FOR RETURN 29210-888-00000-5		0.00	05-25-2015
	ADDITIONAL TAX ASSESSED 71254-712-00015-6    20164505		0.00	11-28-2016
05-25-2017	ASSESSMENT STATUTE EXPIR DATE EXTEND TO 05-24-2020			
05-24-2017	AMENDED RETURN FILED 49277-558-09769-7			
	ESTIMATED TAX PENALTY 20173005		124.76	08-14-2017
	LATE FILING PENALTY 20173005		1,563.30	08-14-2017
	ADDITIONAL TAX ASSESSED BY EXAMINATION AUDIT DEFICIENCY PER DEFAULT OF 90 DAY LETTER 49247-606-00139-7    20173005		6,948.00	08-14-2017
	INTEREST ASSESSED 20173005		1,024.38	08-14-2017
	FAILURE TO PAY TAX PENALTY 20173005		1,389.60	08-14-2017

**FORM 4340    (REV. 01-2002)**

**PAGE    1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
[REDACTED] 3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2013

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
11-27-2017	CLAIM DISALLOWED 71254-707-98008-7	05		
12-01-2014	Taxpayer Delinquency Notice			
08-14-2017	Statutory Notice of Balance Due			
02-26-2018	Statutory Notice of Intent to Levy			

FORM 4340 (REV. 01-2002)

PAGE 2

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218  
3195

TYPE OF TAX: U.S. INDIVIDUAL INCOME TAX RETURN  
FORM: 1040 TAX PERIOD: DEC 2013

BALANCE 11,050.04

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams

TITLE: Accounting Operations Manager

DELEGATION ORDER: Submission Processing

Service Wide Delegation of Authority  
Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 3



# **EXHIBIT 2**

**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**


I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for Civil Penalty (Form CVPN), for the tax period ending December 31, 2008 consisting of 2 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2008

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT DATE
------	----------------------------	---	----------------------------------	--------------------

FORM 4340 (REV. 01-2002)

PAGE 1

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2008

BALANCE 0.00

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing

DELEGATION ORDER: Service Wide Delegation of Authority  
Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 2

United States



Of America

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

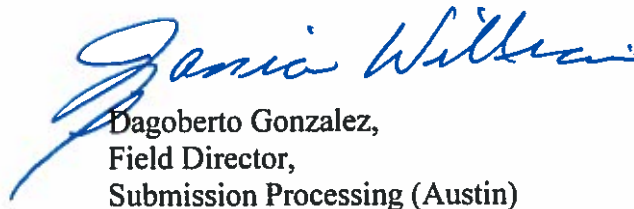
I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for Civil Penalty (Form CVPN), for the tax period ending December 31, 2009 consisting of 2 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

-----  
**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**  
 -----

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: CIVIL PENALTY**  
**FORM: CVPN            TAX PERIOD: DEC   2009**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-713-52017-7   20174605	5,000.00		12-04-2017
	ADDITIONAL TAX ASSESSED 71254-713-52017-7   20174605		0.00	12-04-2017

**12-04-2017 Statutory Notice of Balance Due**

**FORM 4340   (REV. 01-2002)**

**PAGE   1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2009

BALANCE 5,000.00

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing  
Service Wide Delegation of Authority

DELEGATION ORDER: Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 2

**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for Civil Penalty (Form CVPN), for the tax period ending December 31, 2010 consisting of 2 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)



**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: CIVIL PENALTY**  
**FORM: CVPN**      **TAX PERIOD: DEC 2010**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-713-52018-7 20174605	5,000.00		12-04-2017
	ADDITIONAL TAX ASSESSED 71254-713-52018-7 20174605	0.00		12-04-2017
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-458-52015-8 20180905	5,000.00		03-19-2018
	ADDITIONAL TAX ASSESSED 71254-458-52015-8 20180905	0.00		03-19-2018
	INTEREST ASSESSED 20180905	57.87		03-19-2018

**12-04-2017** Statutory Notice of Balance Due

**03-05-2018** Statutory Notice of Intent to Levy

**03-19-2018** Statutory Notice of Balance Due

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2010

BALANCE 10,057.87

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing  
Service Wide Delegation of Authority

DELEGATION ORDER: Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 2

**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for Civil Penalty (Form CVPN), for the tax period ending December 31, 2012 consisting of 2 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: CIVIL PENALTY**  
**FORM: CVPN**      **TAX PERIOD: DEC 2012**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-713-52019-7 20174605	5,000.00		12-04-2017
	ADDITIONAL TAX ASSESSED 71254-713-52019-7 20174605	0.00		12-04-2017
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-458-52016-8 20180905	5,000.00		03-19-2018
	ADDITIONAL TAX ASSESSED 71254-458-52016-8 20180905	0.00		03-19-2018
	INTEREST ASSESSED 20180905	57.87		03-19-2018

12-04-2017 Statutory Notice of Balance Due  
03-05-2018 Statutory Notice of Intent to Levy  
03-19-2018 Statutory Notice of Balance Due

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

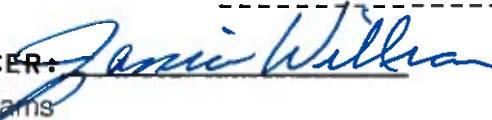
EIN/SSN: 082-48-2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2012

BALANCE 10,057.87

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER:



PRINT NAME:

Janice Williams

Accounting Operations Manager

TITLE:

Submission Processing

Service Wide Delegation of Authority

DELEGATION ORDER:

Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 2

**United States**



**Of America**

**Department of the Treasury  
Internal Revenue Service**

Date: **MAR 28 2018**

**CERTIFICATE OF OFFICIAL RECORD**

I certify that the annexed: transcript of the taxpayer named therein in respect to the taxes specified, is a true and complete transcript for the period stated, of all assessments, penalties, interest, abatements, credits, refunds, and advance or unidentified payments relating thereto as disclosed by the records of this office as of the date of this certification. Form 4340, Certificate of Assessments, Payments, and Other Specified Matters for, John J Schlabach, for Civil Penalty (Form CVPN), for the tax period ending December 31, 2013 consisting of 3 pages

under the custody of this office.

IN WITNESS WHEREOF, I have hereunto set my hand, and caused the seal of this office to be affixed, on the day and year first above written.

By direction of the Secretary of the Treasury:



*Dagoberto Gonzalez*  
Dagoberto Gonzalez,  
Field Director,  
Submission Processing (Austin)

Form **2866** (Rev. 09-1997)

**CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS**

**JOHN J SCHLABACH**

**EIN/SSN:** [REDACTED] **2218**

**TYPE OF TAX: CIVIL PENALTY**  
**FORM: CVPN**      **TAX PERIOD: DEC 2013**

<b>DATE</b>	<b>EXPLANATION OF TRANSACTION</b>	<b>ASSESSMENT, OTHER DEBITS (REVERSAL)</b>	<b>PAYMENT, CREDIT (REVERSAL)</b>	<b>ASSESSMENT DATE</b>
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 29254-752-52203-4 20145204	5,000.00		01-12-2015
	ADDITIONAL TAX ASSESSED 29254-752-52203-4 20145204	0.00		01-12-2015
	MISCELLANEOUS PENALTY IRC 6702 PENALTY FOR FILING FRIVOLOUS INCOME TAX RETURN 71254-712-52002-6 20164505	5,000.00		11-28-2016
	ADDITIONAL TAX ASSESSED 71254-712-52002-6 20164505	0.00		11-28-2016
11-28-2016	OVERPAID CREDIT APPLIED 1040 201512		1,688.46	
11-28-2016	INTEREST OVERPAYMENT CREDIT 1040 201512		42.41	
04-15-2017	OVERPAID CREDIT APPLIED 1040 201612		8,724.68	
	INTEREST ASSESSED 20171705	455.55		05-15-2017
01-12-2015	Statutory Notice of Balance Due			
03-09-2015	Statutory Notice of Intent to Levy			

**FORM 4340 (REV. 01-2002)**

**PAGE 1**

CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2013

DATE	EXPLANATION OF TRANSACTION	ASSESSMENT, OTHER DEBITS (REVERSAL)	PAYMENT, CREDIT (REVERSAL)	ASSESSMENT, DATE (23C, RAC 006 )
------	----------------------------	---	----------------------------------	--

11-28-2016 Statutory Notice of Balance Due

FORM 4340 (REV. 01-2002)

PAGE 2



CERTIFICATE OF ASSESSMENTS, PAYMENTS, AND OTHER SPECIFIED MATTERS

JOHN J SCHLABACH

EIN/SSN: [REDACTED] 2218

TYPE OF TAX: CIVIL PENALTY  
FORM: CVPN TAX PERIOD: DEC 2013

BALANCE 0.00

I CERTIFY THAT THE FOREGOING TRANSCRIPT FOR THE ACCOUNT OF THE TAXPAYER NAMED ABOVE IN RESPECT TO THE TAXES SPECIFIED IS A TRUE AND COMPLETE DATA COMPILATION FOR THE PERIOD STATED OF ALL ASSESSMENTS, ABATEMENTS, CREDITS, REFUNDS, AND ADVANCE OR UNIDENTIFIED PAYMENTS, AND THE ASSESSED BALANCE RELATING THERETO, AS DISCLOSED BY THE RECORDS OF THIS OFFICE AS OF THE ACCOUNT STATUS DATE SHOWN BELOW. I FURTHER CERTIFY THAT THE OTHER SPECIFIED MATTERS SET FORTH IN THIS TRANSCRIPT APPEAR IN RECORDS OF THIS OFFICE. THE RECORDS ARE UNDER THE CUSTODY OF, AND SET FORTH THE ACTIVITIES OF, THIS OFFICE.

SIGNATURE OF CERTIFYING OFFICER: 

PRINT NAME: Janice Williams  
Accounting Operations Manager

TITLE: Submission Processing

DELEGATION ORDER: Service Wide Delegation of Authority  
Delegation Order 11-5

LOCATION: INTERNAL REVENUE SERVICE

ACCOUNT STATUS DATE 03/22/2018

FORM 4340 (REV. 01-2002)

PAGE 3

# **EXHIBIT 3**

**UNITED STATES TAX COURT**  
**WASHINGTON, DC 20217**

JOHN J. SCHLABACH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 11781-11
	)	
COMMISSIONER OF INTERNAL REVENUE,	)	
	)	
Respondent.	)	
	)	

**ORDER OF DISMISSAL AND DECISION**

This case was called from the calendar for the trial session of the Court on November 26, 2012, at Spokane, Washington. There was no appearance by or on the behalf of petitioner. Counsel for respondent appeared and filed a Motion to Dismiss for Lack of Prosecution. On November 27, 2012, the Court issued an Order to Show Cause, directed petitioner to show cause in writing, on or before December 17, 2012, why this case should not be dismissed for lack of prosecution. On December 17, 2012, petitioner's Response to Court's November 27, 2012 Order to Show Cause (petitioner's response) was filed. Petitioner's response, however, fails to provide an explanation as to why petitioner was not present at the trial of this case on November 26, 2012, in Spokane, Washington. Given due consideration to the foregoing and for the reasons stated in respondent's motion to dismiss for lack of prosecution, it is

ORDERED that the Court's Order to Show Cause, dated November 27, 2012, is hereby discharged. It is further

ORDERED that respondent's Motion to Dismiss for Lack of Prosecution, filed November 27, 2012, is granted, and this case is dismissed for lack of prosecution. It is further

ORDERED AND DECIDED that there is a deficiency in petitioner's Federal income tax for the taxable year 2008 in the amount of \$1,350, an addition to tax under I.R.C. section 6651(a)(1) of \$231, and an addition to tax under I.R.C. section 6651(a)(2) of \$0.

**(Signed) L. Paige Marvel**  
**Judge**

ENTERED: **JAN 03 2013**

**SERVED Jan 03 2013**

# **EXHIBIT 4**

**UNITED STATES TAX COURT**  
**WASHINGTON, DC 20217**

JOHN J. SCHLABACH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 16044-12.
	)	
COMMISSIONER OF INTERNAL REVENUE,	)	
	)	
Respondent	)	

**ORDER OF DISMISSAL AND DECISION**

This case was called from the calendar for the Trial Session of the Court at Spokane, Washington, on October 28, 2013. There was no appearance by or on behalf of petitioner. Counsel for respondent appeared and filed a Motion to Dismiss for Failure to Properly Prosecute.

The Court may dismiss a case at any time and enter a decision against the taxpayer for failure to properly prosecute his case, failure to comply with the Rules or any order of this Court, or for any cause which the Court deems sufficient. Rule 123(b);<sup>1</sup> Edelson v. Commissioner, 829 F.2d 828, 831 (9th Cir. 1983) aff'g T.C. Memo. 1986-223. The Court may also dismiss a case for lack of prosecution if the taxpayer inexcusably fails to appear at trial and does not otherwise participate in the resolution of his claim. Rule 149(a); Tipton v. Commissioner, 127 T.C. 217 (2006).

On June 4, 2012, the Court's Notice Setting Case for Trial scheduling a trial in this case for October 28, 2013, and Standing Pretrial Order were served on petitioner. The notice setting case for trial advised petitioner that he was expected to be present on the trial date and prepared to try his case. In addition the notice setting case for trial warned petitioner that his failure to appear could result in dismissal of the case and entry of a decision against him.

---

<sup>1</sup>Rule references are to the Tax Court Rules of Practice and Procedure and section references are to the Internal Revenue Code in effect for the year at issue.

In violation of the Court's notice, petitioner failed to appear on October 28, 2013. It is therefore

ORDERED that respondent's Motion to Dismiss for Failure to Properly Prosecute is granted and that this case is dismissed for lack of prosecution. It is further

ORDERED and DECIDED that there is a deficiency in tax and additions to tax due from petitioner as follows:

<u>Year</u>	<u>Deficiency</u>	<u>Additions to Tax</u>	
		<u>Sec. 6651 (a)(1)</u>	<u>Sec. 6651(a)(2)</u>
2009	\$4,079.00	\$784.13	\$697.00*

\* The amount of any addition to tax under section 6651(a)(2) shall be determined under section 6651(a)(2), (b), and (c).

**(Signed) Joel Gerber  
Judge**

ENTERED: **NOV 13 2013**